

REMARKS

The Official Action mailed April 27, 2010 has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

Initially, it is noted that the Applicant would like to discuss the present application with the Examiner in a interview. The Applicant's representative will contact the Examiner to arrange a mutually agreeable time and place for the interview.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on June 19, 2006; September 1, 2006; and March 14, 2008.

A further Information Disclosure Statement was submitted on May 4, 2010 and consideration of this Information Disclosure Statement is respectfully requested.

Claims 1-14 were pending in the present application, of which claims 1-9 are independent. Claims 1-4, 8 and 9 have been amended to better recite the features of the present invention and new claims 15-20 have been added to recite additional protection to which the Applicant is entitled. Claims 5-7 have been withdrawn from consideration by the Examiner. Accordingly, claims 1-4 and 8-20 are currently elected, of which claims 1-4, 8 and 9 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

The Official Action notes that the claims recite the word "polyimide" twice. In response, independent claims 1-4, 8 and 9 have been amended to recite that the resin or insulating film comprise at least one selected from "the group of polyimide, epoxy, acryl and ~~polyimide~~ polyamide."

The Official Action rejects claims 1-4 and 8-14 as obvious based on the combination of U.S. Patent No. 6,509,217 to Reddy, U.S. Publication No. 2001/0038127 to Yamazaki and U.S. Publication No. 2005/0140539 to Fujieda. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

As stated in MPEP §§ 2142-2144.04, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some reason, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some reason to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. As noted above, independent claims 1-4, 8 and 9 recite that the resin or insulating film comprise at least one selected from the group of polyimide, epoxy, acryl and polyamide. The claims have been further amended to recite a positional relationship between the insulating film/resin film and the integrated circuit, as shown, for example, in Figures 1A, 7A-9B and 17. Specifically, claims 1, 3 and 8 have been amended to recite an insulating film over the conducting wire and the integrated circuit and claims 2, 4 and 9 have been similarly amended to recite the resin film over the conducting wire and the integrated circuit. For the reasons provided below, the Applicant respectfully submits that Reddy, Yamazaki '127 and Fujieda, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.

The Official Action asserts that "regarding the limitations of "comprising at least one selected from the group of polyimide, epoxy, acryl and polyimide", these limitations

precisely describe the Yamazaki's "an isotropic conductive material" and "a resin." The Applicant respectfully disagrees and traverses the assertions of the Official Action. The recitation that the resin (or insulating film) comprises at least one selected from the group of polyimide, epoxy, acryl and polyamide is distinct from the mere disclosure of a resin. Yamazaki does not teach or suggest a resin comprising one selected from the claimed group. Furthermore, the Official Action alleges that U.S. Patent No. 4,481,526 to Miyasaka is evidence that "the use of polyimide as a resin is obvious and gives an example of a benefit that such a resin can provide" (page 5, Id.). The Applicant respectfully disagrees and traverses the assertion of the Official Action. The benefit of using polyimide as a resin in Miyasaka does not inexorably translate into a reason to apply polyimide in Yamazaki '127. Specifically, as the Official Action notes, the polyimide resin of Miyasaka is used "for the purposes of radiation shielding." While the Official Action asserts that this is "very close to what secondary reference Fujieda refers to: absorption of electromagnetic radiation" (Id.), the Applicant notes that the Official Action has relied on Yamazaki '127, not Fujieda, to provide an insulating film or resin. However, resin 215 of Yamazaki '127 is formed in order to mount a stick driver and is wholly unrelated to the alleged benefit of "radiation shielding." See, Yamazaki '127 at paragraph [0066]. Therefore, Miyasaka does not teach or suggest, or provide evidence that, it would have been obvious to use polyimide as a resin in the practice of Yamazaki's invention.

In any event, the asserted prior art, either alone or in combination, does not teach or suggest the resin or insulating film over the conducting wire and the integrated circuit. The Official Action concedes that Reddy does not disclose an insulating film ... over the conducting wire but relies on Yamazaki '127 to allegedly teach "in FIG. 4A and related text, e.g., an insulating film (215)" and asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify the device of Reddy with via 108/110 made of an insulating film and particles..." (page 4, Paper No. 20100423). However, the asserted insulating film 215 of Yamazaki '127 is not formed over an integrated circuit and Fujieda, relied upon in the Official Action to allegedly

teach soft magnetic particles, does not cure the deficiencies of Reddy and Yamazaki. Furthermore, the asserted references do not suggest modifying Reddy to place the asserted insulating film or resin over an integrated circuit.

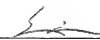
Therefore, the Applicant respectfully submits that Reddy, Yamazaki, and Fujieda, either alone or in combination, do not teach or suggest that the resin or insulating film comprise at least one selected from the group of polyimide, epoxy, acryl and polyamide or that the resin or insulating film is over the conducting wire and the integrated circuit. In any event, Miyasaka does not evidence a benefit or advantage that is applicable to the teachings of Yamazaki. Since Reddy, Yamazaki, and Fujieda do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

New claims 15-20 have been added to recite additional protection to which the Applicant is entitled. For the reasons stated above and already of record, the Applicant respectfully submits that new claims 15-20 are in condition for allowance.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

The Commissioner is hereby authorized to charge fees under 37 C.F.R. §§ 1.16, 1.17, 1.20(a), 1.20(b), 1.20(c), and 1.20(d) (except the Issue Fee) which may be required now or hereafter, or credit any overpayment to Deposit Account No. 50-2280.

Respectfully submitted,



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